



U.S. Department of Justice

United States Attorney Eastern District of New York

OO F. #2022R00544 271 Cadman Plaza East Brooklyn, New York 11201

July 28, 2022

By ECF

The Honorable Hector Gonzalez United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

> Re: United States v. Christopher Gunn Criminal Docket No. 22-314 (HG)

Dear Judge Gonzalez:

The government submits this letter to advise the Court of new information relevant to the bond revocation application currently pending before the Court. See ECF No. 12. On July 28, 2022, the government learned that on or about July 26, 2022, two days before the scheduled status conference before this Court, the defendant narrated a video which was live-streamed on YouTube on the "DeBoSki Gunn" YouTube account (the "Video"). In the Video, the defendant states, in sum and substance and in part, "I am going to make y'all motherfuckers pay" and "I don't care how long it takes, I'm going to get you motherfuckers back, and I'm going to get you back in real time." In another portion of the Video, the defendant states "You better hope they keep me on this leg monitor for life. You better hope they keep me on this shit for 50 years." The defendant also says, "the next time you hear from me I' going to be in some fucked up shit." In addition to violating the conditions of release which require that the defendant refrain from contact with any person who is or may be a victim or witness in the investigation or prosecution, the Video in demonstrates that "there is no condition or combination of conditions that will assure the [defendant] will not pose a danger to the safety of any other person or the community." See Title 18, United States Code, Section 3148.

¹ The July 26, 2022 video will be provided to the Court under separate cover.

For the foregoing reasons, and those set forth in the government' July 28, 2022 letter, see ECF No. 12, the government joins Pretrial Services and respectfully requests that the court revoke the defendant's bond and detain the defendant pending trial.

Respectfully submitted,

BREON PEACE United States Attorney

By: /s/

Olatokunbo Olaniyan Assistant U.S. Attorney (718) 254-6317

Enclosures

cc: Clerk of Court (HG) (by ECF)

Allegra Glashausser, Esq. (by ECF and E-Mail)

Bianca Carter, U.S. Pretrial Services Officer (by E-mail)